

Polek, Jim

From: Woo, Nancy
Sent: Wednesday, December 17, 2014 5:22 PM
To: Whitson, Amelia; Strauss, Alexis; Dermer, Michele; Diamond, Jane
Cc: Greenberg, Ken; Smith, DavidW
Subject: RE: Ventura County Waste Water Issues

Hi Alexis,
Let me work with the water div. team to ensure we collect the information for the relevant water programs. If possible, let us get back to you next week and I will keep Jane in the loop as well.
Thanks,
nw

Nancy Woo
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Phone: 415-972-3409

From: Whitson, Amelia
Sent: Wednesday, December 17, 2014 5:12 PM
To: Strauss, Alexis; Woo, Nancy; Dermer, Michele
Cc: Greenberg, Ken; Smith, DavidW
Subject: RE: Ventura County Waste Water Issues

Hi Alexis,

Certainly – regarding CWA:

Santa Clara Waste Water

- Permitted under CA's industrial general stormwater permit.
- Locally permitted by the Oxnard wastewater treatment plant as a categorical industrial user under the Centralized Waste Treatment category, subject to the pretreatment standards at [40 CFR 437.47](#).
- Not NPDES-permitted for wastewater discharge.

Anterra

- Permitted under CA's industrial general stormwater permit.
- Not listed as an industrial user in Oxnard's most recent pretreatment annual report (I also checked Ventura County's pretreatment annual report to be sure, but it wasn't listed there either).
- Based on a search of the LA Regional Board's website, they don't appear to be permitted under state waste discharge requirements or an NPDES permit for wastewater discharge.
- I've got a call in to the LA Regional Board to see if they have any additional info about this facility.

Please let me know if there's any other info you'd like. I'm in the office tomorrow (Th 12/18), or M-W next week if you would like to meet or discuss.

Best,
Amelia

Amelia Whitson
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From: Strauss, Alexis
Sent: Wednesday, December 17, 2014 4:11 PM
To: Woo, Nancy; Whitson, Amelia; Dermer, Michele
Subject: FW: Ventura County Waste Water Issues

Can we get together and determine CWA and SDWA UIC coverage for the two Ventura facilities, per Tom D's note below? I'm interested in pretreatment, stormwater, wastewater, oil&gas, etc.

From: Dunkelman, Tom
Sent: Tuesday, December 09, 2014 3:26 PM
To: Greenberg, Ken; Allen, HarryL; Manzanilla, Enrique; Strauss, Alexis
Cc: Waldon, MARGARET; Powell, Martin
Subject: Ventura County Waste Water Issues

Today I attended a meeting of the Ventura County Supervisors. The focus of the meeting had less to do with the current emergency response at the Santa Clara Waste Water facility, and more to do with the current and future status of the only two commercial wastewater treatment facilities in the County – Santa Clara and Anterra (which does underground injection). My only involvement in the meeting was to briefly respond to a question from one of the Supervisors regarding EPA involvement in the permitting and regulation of these facilities. I responded that the Superfund Emergency Response program was not involved in regulatory issues pertaining to these facilities, but would pass the question on.

There was a fairly sizeable audience and this seems likely to be a significant issue that would involve EPA in the future. Here is a quick summary of the issue.

The Santa Clara Waste Water facility had a fire and explosion three weeks ago, and has been shut down ever since, while the cleanup is ongoing. The facility faces very significant hurdles before (if?) it is allowed to re-open. These hurdles include an ongoing criminal investigation by the Ventura County DA. There is a 14 mile pipeline that extends from the Santa Clara facility to the City of Oxnard wastewater treatment plant. There have been at least two significant rad exceedances in the discharge from Santa Clara to the Oxnard plant, and consequently Oxnard is no longer accepting treated waste water from Santa Clara. There are also significant H₂S issues in the wastewater coming from Santa Clara. The City of Oxnard only receives about \$350,000 per year from Santa Clara, and it seems likely they may decide against allowing Santa Clara to discharge water to them in the future. This would appear to put the future of the Santa Clara Waste Water facility in question.

The only other commercial wastewater treatment facility in the County is the Anterra facility. This facility receives a much smaller range of waste streams (typically only oily water and brine from small oil producers). With the recent fire and explosion at Santa Clara, there is a lot of focus on the Anterra facility as well. During the meeting, there were many concerns raised regarding the safety of having a facility of this type in close proximity to schools and residences in Oxnard. EJ issues were also raised. There were an equal number of comments from the audience (primarily industry types), regarding the need to have this type of facility in the County and the associated jobs. With Santa Clara being closed, the Anterra facility has been allowed to receive a greater number of truckloads per day (44 – up from the

permitted number of 24). This exemption ends on Saturday. The Anterra facility is also up for a new permit in the next two years or so.

I am not sure to what degree EPA is involved in the permitting and regulation of these two facilities, but I am sure there will additional questions and issues forthcoming. These issues seem to be heightened by the concern that some of the wastewater coming to both of these facilities may be related to fracking.